## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Anastacio Lemus Lopez,

Case No. 17-cv-01179-PAM-TNL

Plaintiff,

v.

Minnesota Vikings Football Club, LLC, et al.,

Defendants,

and

SMG,

Cross-claim Plaintiff,

v.

City of Minneapolis,

Cross-claim Defendant.

DECLARATION OF MICHAEL S.
MARTINEZ IN SUPPORT OF
PLAINTIFF ANASTACIO
LOPEZ'S RESPONSE TO
DEFENDANT MINNESOTA
SPORTS FACILITIES
AUTHORITY'S MOTION TO
DISMISS

## I, Michael S. Martinez, declare:

- 1. I am licensed to practice law in the State of Texas and am admitted pro hac vice to practice before the United States District Court for the District of Minnesota. I am an attorney at Martinez Hsu, P.C.
- I represent Anastacio Lopez ("Plaintiff") with respect to this litigation.
   I submit this declaration in support of the Plaintiff's Response to Defendant

Minnesota Sports Facilities Authority's Motion to Dismiss the First Amended Complaint.

- 3. Attached as Exhibit 1 is a true and correct copy of the Management and Pre-Opening Services Agreement Between Minnesota Sports Facilities Authority and SMG, dated August 22, 2014, which Plaintiff was provided in discovery in this case.
- 4. Attached as Exhibit 2 is a true and correct copy of a StarTribune.com article entitled "U.S. Bank Stadium security firm is fired after investigation," published September 27, 2017 at 10:26 am at <a href="http://www.startribune.com/security-firm-at-u-s-bank-stadium-is-fired/447991883">http://www.startribune.com/security-firm-at-u-s-bank-stadium-is-fired/447991883</a>.
- 5. Attached as Exhibit 3 is a true and correct copy of a GoMN.com article entitled "Chicago firm wins security contract for U.S. Bank Stadium," published March 12, 2016 at <a href="https://www.gomn.com/sports/chicago-firm-wins-security-contract-for-u-s-bank-stadium">https://www.gomn.com/sports/chicago-firm-wins-security-contract-for-u-s-bank-stadium</a>.
- 6. Attached as Exhibit 4 is a true and correct copy of a KTSP.com article entitled "Monterrey Security Focus of Fraud Investigation for Alleged Billing Discrepancies," published October 12, 2017 at 10:36 am at <a href="http://kstp.com/news/monterrey-security-focus-of-fraud-investigation-alleged-billing-discrepancies/4632411">http://kstp.com/news/monterrey-security-focus-of-fraud-investigation-alleged-billing-discrepancies/4632411</a>.

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7. Attached as Exhibit 5 is a true and correct copy of a Pioneer Press /

TwinCities.com article entitled "U.S. Bank Stadium's security company gets

sacked over hiring and training irregularities," published September 26, 2017 at

12:35 pm and updated September 27, 2017 at 10:40 am at

https://www.twincities.com/2017/09/26/security-company-for-u-s-bank-stadium-fi

red.

I declare under penalty of perjury under the laws of the United States of

America that the foregoing is true and correct.

Dated: January 4, 2018

s/ Michael S Martinez

Michael S. Martinez

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